

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**SUNITA KHATRI,**

**Plaintiff**

**v.**

**CASE NO. 1:12-cv-00613-JCC-TCB**

**EXPPERIAN INFORMATION SOLUTIONS, INC.,  
TRANS UNION, LLC., EQUIFAX INFORMATION  
SERVICES, LLC., and BRANCH BANKING AND  
TRUST COMPANY,**

**Defendants.**

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO  
DESIGNATE AN EXPERT**

COMES NOW the Plaintiff, with the consent of the Defendant Branch Banking and Trust Services, LLC, and pursuant to Fed. R. Civ. P. 6(b), move the Court for an Extension of Time of two weeks within which to designate her expert and file an expert report in this case, with a corresponding extension of two weeks for the Defendant to designate its expert. Under the scheduling order in this case, the Plaintiff's expert designation is due today. The resulting deadlines will be that the Plaintiff will file an expert designation and report on October 4, 2012, and the Defendant will file on November 5, 2012.

This extension is sought in good faith and not for a dilatory or improper purpose. The date on which the Plaintiff's expert must be designated has not yet expired. No party will be prejudiced as a result of an extension and justice will be served by granting this motion. The Defendant has consented and an agreed order is being circulated for endorsement. For these reasons, the Plaintiff respectfully requests an enlargement of time.

**DILIP NEPAL,**

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of September, 2012, I will file the foregoing Notice of Appearance electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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